

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PHT CORPORATION,	)	
	)	
Plaintiff,	)	
v.	)	Civil Case No. 04-60 GMS
	)	

INVIVODATA, INC.,	)	
	)	
Defendant.	)	

PHT CORPORATION,	)	
	)	
Plaintiff,	)	
v.	)	Civil Case No. 04-61 GMS
	)	

CRF, INC.,	)	
	)	
Defendant.	)	

PHT CORPORATION,	)	
	)	
Plaintiff,	)	
v.	)	Civil Case No. 04-821 GMS
	)	

ETRIALS WORLDWIDE, INC.,	)	
	)	
Defendant.	)	

**NOTICE OF 30(b)(6) DEPOSITION TO CRF, INC.**

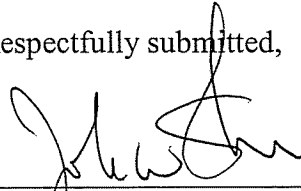
PLEASE TAKE NOTICE that commencing at 9:30 am on July 28, 2005 at the offices of Young Conaway Stargatt & Taylor, L.L.P., The Brandywine Building, 1000 West Street, 17th Floor, P.O. Box 391, Wilmington, Delaware 19899-0391, PHT Corporation ("PHT"), through

its attorneys, will take the deposition of CRF, Inc. ("CRF") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

CRF shall designate one or more of its directors, officers, managing agents, or other persons who will testify on behalf of CRF as to all information known or reasonably available to CRF regarding the topics listed in Appendix A.

The deposition will take place upon oral examination before a notary public or other person authorized to administer oaths, will be recorded by stenographic and sound-and-video means, and will continue from day to day until completed. PHT requests that CRF notify counsel for PHT in writing of the names of the person or persons designated to testify on behalf of CRF as soon as practical after such designations have been made.

Respectfully submitted,



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Josy W. Ingersoll (#1088)

John W. Shaw (#3362)

**YOUNG CONAWAY**

**STARGATT & TAYLOR, LLP**

The Brandywine Building

1000 West Street, 17th Floor

P.O. Box 391

Wilmington, Delaware 19899-0391

(302) 571-6600

Anthony Herman

N. Whitney Wilson

Scott C. Weidenfeller

**COVINGTON & BURLING**

1201 Pennsylvania Ave.

Washington, DC 20004-2401

(202) 662-6000

Dated: July 15, 2005

*Attorneys for PHT Corporation*

**Appendix A**

1. All facts relating to the allegations raised in paragraphs 19-24 and 34-44 of CRF's Counterclaim.
2. The customers and potential customers of CRF with whom PHT allegedly discussed the present lawsuit, including but not limited to, the names of those customers and potential customers and the name and contact information of the individuals at those customers and potential customers with whom those conversations took place.
3. The content of alleged statements by PHT representatives to CRF's customers and potential customers regarding the present lawsuit.
4. The CRF employees or representatives who learned about the alleged conversations between PHT (or PHT representatives) and CRF's customers or potential customers regarding the present lawsuit.
5. The bases for CRF's contention that the statements made by PHT (or PHT representatives) to CRF's customers or potential customers were knowingly false or that the statements were made with "a needless disregard" for their truth or falsity.
6. The damages has CRF suffered "as a direct and proximate cause" of PHT's alleged statements to CRF's customers and potential customers regarding the present lawsuit.

7. The factual bases for CRF's claim that PHT "tortiously interfered with CRF's advantageous business relationships" and the identity of all individuals and entities that have knowledge related to those bases.
8. The factual bases for CRF's contentions that PHT's actions regarding the alleged interference with CRF's advantageous business relationships were "willful and malicious" relationships and the identity of all individuals and entities that have knowledge related to those bases.

**CERTIFICATE OF SERVICE**

I, John W. Shaw, Esquire, hereby certify that on July 15, 2005, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Jack B. Blumenfeld, Esquire  
Morris, Nichols, Arsht & Tunnell  
1201 N. Market Street  
Wilmington, DE 19801

Richard L. Horwitz, Esquire  
Potter Anderson & Corroon LLP  
1313 North Market Street  
Wilmington, DE 19801

I further certify that on July 15, 2005, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

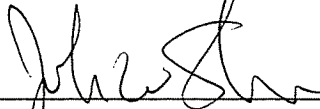
**BY FEDERAL EXPRESS**

Laurence S. Rogers, Esquire  
Avinash S. Lele, Esquire  
Ropes & Gray LLP  
1251 Avenue of the Americas  
New York, NY 10020

Cecilia H. Gonzalez, Esquire  
Howrey Simon Arnold & White, LLP  
1299 Pennsylvania Avenue, N.W.  
Washington, DC 20004

Victor H. Polk, Jr., Esquire  
Bingham McCutchen LLP  
150 Federal Street  
Boston, MA 02110

YOUNG CONAWAY STARGATT & TAYLOR, LLP

A handwritten signature in black ink, appearing to read 'John W. Shaw', is written over a horizontal line.

John W. Shaw (No. 3362)  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, Delaware 19801  
(302) 571-6600  
jshaw@ycst.com

Attorneys for PHT Corporation